STATEMENT OF BASIS

as required by LAC 33:IX.3109 for a draft permit for which a fact sheet under LAC 33:IX.3111 is not prepared, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0038598; AI 41031; PER20070001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

I. **THE APPLICANT IS:** Town of Church Point
Church Point Wastewater Treatment Facility
102 Church Boulevard
Church Point, LA 70525

II. **PREPARED BY:** Todd Franklin

DATE PREPARED: February 14, 2008

III. **PERMIT ACTION:** reissue LPDES permit LA0038598, AI 41031; PER20070001

LPDES application received: December 7, 2007

EPA has not retained enforcement authority.

Previous LPDES permit effective: May 1, 2003
Previous LPDES permit expires: April 30, 2008

IV. **FACILITY INFORMATION:**

A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the Town of Church Point.

B. The permit application does indicate the receipt of industrial wastewater. The industrial dischargers include:

Name of Discharger	Flow
Richards Cajun Foods Corporation	10,000 GPD
Acadiana Fine Food	300 GPD

C. The facility is located at 1034 East Ebey Street in Church Point, Acadia Parish.

D. The treatment facility consists of an activated sludge treatment plant with a final clarifier, post aeration, and Ultraviolet disinfection.

E. Outfall 001

Discharge Location: Latitude 30° 24' 35" North
Longitude 92° 12' 29" West

Description: treated sanitary wastewater

Design Capacity: 0.80 MGD

Type of Flow Measurement which the facility is currently using:

Combination Totalizer Meter / Continuous Recorder

V. RECEIVING WATERS:

The discharge is into Bayou Plaquemine Brule; thence into the Mermentau River in Subsegment 050201 of the Mermentau River Basin. This Subsegment is not listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Subsegment 050201 of the Mermentau River Basin are as indicated in the table below[1/]:

Overall Degree of Support for Segment	Degree of Support of Each Use						
Partial	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Not Supported	Not Supported	Not Supported	N/A	N/A	N/A	Full

[1/]The designated uses and degree of support for Subsegment 050201 of the Mermentau River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 050201 of the Mermentau River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007, from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written

comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mr. Todd Franklin
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Subsegment 050201, Bayou Plaquemine Brule – headwaters to Bayou Des Cannes, is not listed on LDEQ's Final 2004 303(d) list as impaired. However, Subsegment 050201 was previously listed as impaired for mercury, phosphorus, organic enrichment, low DO, ammonia, pathogen indicators, suspended solids, turbidity, siltation, total dissolved solids, and fipronil, for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for Subsegment 050201:

Mercury TMDLs for Subsegments Within Mermentau and Vermilion-Teche Basins

According to the TMDL,

> Point source loading of mercury into waters of the Mermentau and Vermilion-Teche basins is relatively small, approximately 0.6% and 1.5% existing total loads for the Mermentau and Vermilion-Teche basins, respectively. On a watershed scale these point sources are expected to have a relatively minor effect. However, some point sources, particularly larger discharges into small water bodies may represent significant site specific sources of mercury which could contribute to mercury bioaccumulation.

Therefore, the Permits Division shall require that the permittee develop a Mercury Minimization Program Plan to identify and control levels of mercury introduced into the wastewater treatment system.

Bayou Plaquemine Brule TMDL for Ammonia and Bayou Plaquemine Brule Watershed TMDL to Address Dissolved Oxygen and Nutrients Including Eight Point Source Wasteload Allocations and a Watershed Nonpoint Source Load Allocation

The above TMDLs established load limitations for oxygen-demanding substances and nutrients within the Bayou Plaquemine Brule watershed. The goals for reduction of those pollutants resulted in the development of Wasteload Allocations for eight point source dischargers, including the Town of Church Point.

The effluent limitations assigned to the Town of Church Point are as follows:

$CBOD_5$: March – November – 10 mg/l Monthly Average / 67 lbs/day Monthly Average
December – February – 20 mg/l Monthly Average / 133 lbs/day Monthly Average

NH_3-N: March – November – 2 mg/l Monthly Average / 13 lbs/day Monthly Average
December – February – 10 mg/l Monthly Average / 67 lbs/day Monthly Average

DO: March – November – 5 mg/l lowest allowable average of daily discharges
December – February - 6 mg/l lowest allowable average of daily discharges

The above TMDLs upon finalization became part of Louisiana's approved Water Quality Management Plan (WQMP). In accordance with LAC 33:IX.2707.D.6, LDEQ is required to ensure that LPDES permits are consistent with the WQMP as approved by EPA under §208(b) of the CWA. Therefore, LDEQ must implement the TMDLs and wasteload allocations contained within into the affected LPDES permits.

On December 27, 2007, this Office received correspondence from the Town of Church Point requesting that the permit limits be changed to 10 mg/l $CBOD_5$ monthly average and 20 mg/l NH_3-N monthly average year round, rather than becoming more stringent during the summer season. The request states that the ultimate receiving water for this discharge and four other similar discharges (Iota, Mermentau, Rayne, and Crowley) is the Mermentau River; therefore, the Town believes its permit limits should be similar to limitations imposed on the Town of Iota and the Town of Mermentau, since the flow is less than 1.0 MGD.

The intention of a TMDL is to provide appropriate loadings to the point and non-point sources within a watershed to ensure the stream will come into and maintain compliance with its water quality standards. Providing less stringent limitations that will allow the Town of Church Point to ensure compliance is not the intent of the TMDL. All point source discharges faced with more stringent effluent limitations imposed by a TMDL must take appropriate action to come into compliance with the TMDL in a timely manner.

In order to provide the Town of Church Point assistance in achieving compliance with the effluent limitations as imposed by the TMDL, effluent limitations for NH_3-N have been established as a loading parameter only. Basing the effluent limitations on the design flow of 0.8 MGD as utilized in the TMDL is consistent with the calculations and reductions required for Bayou Plaquemine Brule to achieve compliance with the water quality standard.

Bayou Plaquemine Brule TMDL for Fecal Coliform

As per the TMDL, "The Louisiana Water Quality Regulations require point source discharges of treated sanitary wastewater to maintain a fecal coliform count of 200 cfu/100 ml in their effluent, i.e., they must meet the standard at end-of-pipe. Therefore, there will be no change in the permit requirements based upon a wasteload allocation resulting from this TMDL."

TMDL for TSS, Turbidity, and Siltation for the Mermentau River Basin

As per the TMDL,

> Point Sources do not represent a significant source of TSS as defined in this TMDL. Point Sources discharge primarily organic TSS, which does not contribute to habitat impairment resulting from sedimentation. Because the point sources are minor contributors and discharges or organic suspended solids from point sources are already addressed by LDEQ through their permitting of point sources to maintain water quality standards for DO, the wasteload allocations for point source contributions were set to zero. This TMDL only addresses the landform contribution of TSS / sediment and does not address the insignificant point source contributions.

Therefore, TSS limitations are being placed into the permit according to the current state policy.

Bayou Plaquemine Brule TMDL for Total Dissolved Solids (TDS)

The TMDL establishes a TDS wasteload allocation for the Town of Church Point Wastewater Treatment Facility of 1,735 lbs/day. This number is derived from the design flow of the treatment plant (0.8 MGD) and the TDS criterion of the Subsegment (260 mg/l). Therefore, a limitation of 1,735 lbs/day Monthly Average shall be established in the permit. The permittee will be given a compliance schedule to meet this newly imposed TDS limitation.

TMDL for the Pesticide Fipronil in the Mermentau River Basin

As per the TMDL,

> There are no known point sources for fipronil in the Mermentau River Basin. Effluent from several hundred other point source dischargers in the Mermentau River Basin is not expected to contain fipronil because its use is limited to rice farming. Therefore, concentrations of fipronil in their effluents are not expected and would be considered an enforcement issue and dealt with accordingly.

Therefore, limitations for fipronil are not necessary for this permit.

Interim Effluent Limits:

Outfall 001

Interim limits shall become effective on the effective date of the permit and expire on April 24, 2009.

All effluent limits found under the Final Effluent Limits shall apply during the Interim Effluent Limits with the exception of TDS, for which the requirements are listed below:

Effluent Characteristic	Monthly Avg. (lbs./day)	Basis
TDS	Report	Limits for TDS are required according to the Bayou Plaquemine Brule TMDL for Total Dissolved Solids (TDS). According to a MOA between LDEQ and USEPA, the LDEQ shall implement the TMDL within the earlier of six years from the date the TMDL is established of three years following the first expiration of the permit after the TMDL is established. The TMDL was established on April 25, 2003. Therefore, the effluent limits must be established in the permit within six years from that date. In the Interim period, prior to implementation of the TMDL, "Report" for TDS will be required.

Final Effluent Limits:

OUTFALL 001

Final limits shall become effective on April 25, 2009, and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
$CBOD_5$				Limits are set in accordance with the Bayou Plaquemine Brule TMDL for Ammonia and Bayou Plaquemine Brule Watershed TMDL to Address Dissolved Oxygen and Nutrients Including Eight Point Source Wasteload Allocations and a Watershed Nonpoint Source Load Allocation.
March – November	67	10 mg/l	15 mg/l	
December - February	133	20 mg/l	30 mg/l	
Total Suspended Solids (TSS)	100	15 mg/l	23 mg/l	Limits are in accordance with the TMDL for TSS, Turbidity, and Siltation for the Mermentau River Basin.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
Ammonia-Nitrogen (NH_3-N) March – November December – February	 13 67	 Report (mg/l) Report (mg/l)	 Report (mg/l) Report (mg/l)	Limits are set in accordance with the Bayou Plaquemine Brule TMDL for Ammonia and Bayou Plaquemine Brule Watershed TMDL to Address Dissolved Oxygen and Nutrients Including Eight Point Source Wasteload Allocations and a Watershed Nonpoint Source Load Allocation.
Dissolved Oxygen (DO)* March – November December - February	 N/A N/A	 5 mg/l 6 mg/l	 N/A N/A	Limits are set in accordance with the Bayou Plaquemine Brule TMDL for Ammonia and Bayou Plaquemine Brule Watershed TMDL to Address Dissolved Oxygen and Nutrients Including Eight Point Source Wasteload Allocations and a Watershed Nonpoint Source Load Allocation.
Total Dissolved Solids (TDS)	1,735	---	---	Limits are set in accordance with the Bayou Plaquemine Brule TMDL for Total Dissolved Solids (TDS).

* This Dissolved Oxygen limit is the lowest allowable average of daily discharges over a calendar month.

Other Effluent Limitations:

1) **Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.a, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) **pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) **Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0038598: Effective: May 1, 2003
Expired: April 30, 2008

Effluent Characteristic	Discharge Limitations Monthly Avg.	Weekly Avg.	Monitoring Requirements Measurement Frequency	Sample Type
Flow	Report (MGD)	Report (MGD)	Continuous	Recorder
$CBOD_5$				
March - November	66.7 lbs/day / 10 mg/l	15 mg/l	1 / 2 months	3HrComp
December – February	133.4 lbs/day / 20 mg/l	30 mg/l	1 / 2 months	3HrComp
TSS	100.1 lbs/day / 15 mg/l	23 mg/l	2 / month	3HrComp
Ammonia-Nitrogen				
March – November	13.3 lbs/day / 2 mg/l	4 mg/l	1 / week	3HrComp
December – February	66.7 lbs/day / 10 mg/l	20 mg/l	1 / week	3HrComp
Dissolved Oxygen				
March – November	5 mg/l	---	1 / week	Grab
December – February	6 mg/l	---	1 / week	Grab
Total Dissolved Solids	Report (lbs/day)	---	1 / quarter	Grab
Fecal Coliform				
Colonies/100 ml	200	400	1 / week	Grab
pH	Within the Range of 6.0 su – 9.0 su		1 / week	Grab

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the following most recent inspection performed for this facility.

Date – November 29, 2007
Inspector – LDEQ
Findings and/or Violations -

1. Permit was available for review and expires on May 1, 2008. The Town was in the process of re-applying at the time of the inspection.
2. DMRs and lab analysis sheets were available along with overflow reports. Facility is sampling as required.
3. Facility is a municipal WWTP that uses counter-current aeration with a digester available and post aeration for treatment. Grounds well kept and in order.
4. Discharge was clear with no foam or visible solids.
5. Flow calculation check revealed an error of 8.39; last calibration was on July 12, 2007.
6. All analysis is conducted by HOH-PAK Labs; sample holding refrigerator did have a thermometer.
7. Plant operating properly at the time; centrifugal grit remover has been down for about 8 to 9 months; blower motors operational with a good mix in the aeration basin; clarifier covered with duckweed due to skimmer being down; UV lights operational (cleaned twice per month).
8. Sludge drying beds in good condition; sludge is dried and tested then sent to the Acadia Parish Landfill.
9. Pollution Prevention Plant (MWPP) is not being completed as required.
10. Facility is still accepting waste from septic haulers; this activity is not part of the permit application and permission has not been given to the facility by the Permits

Division; facility receives approximately 30 loads per month at about 360 gallons total.

11. DMR review from January – September 2007 revealed excursions for Ammonia-Nitrogen and fecal coliform
12. Plant experiences overloads due to I&I problems in the collection system; work is ongoing to correct these problems; collection system overflows appear to be consistently in the same areas.

B) Compliance and/or Administrative Orders

A review of the files indicates the following most recent enforcement action administered against this facility:

LDEQ Issuance:

Compliance Order
Enforcement Tracking No. WE-C-04-1076
Date Issued – May 23, 2005
Findings of Fact:

1. Inspections revealed that the Respondent's POTW experiences severe inflow and infiltration problems. A review of the Respondents flow charts revealed the flow meter would peak-out at flow rates greater than 1 MGD during rain events. Flows charted on non-rain days averaged between 0.3 and 0.35 MGD.
2. An inspection and subsequent file review revealed that the Respondent failed to report a sewage overflow as required by their discharge permit. Specifically, the Respondent experienced a clogged sewage line on June 16, 2003, which then backed up and overflowed into storm water drainage, thence into a coulee near West Breaux Street. The Respondent failed to report this unauthorized discharge of sanitary wastewater.
3. The Respondent's flow meter was inoperable from July 19, 2004, until August 19, 2004. The LPDES permit requires flow to be continuously monitored.
4. A DMR review revealed effluent violations for fecal coliform and ammonia-nitrogen. From March 2001 through June 2004, twenty fecal coliform excursions were reported and twenty-one ammonia-nitrogen excursions were reported.
5. A file review revealed numerous collection system overflows had occurred.

Order:

1. To immediately take all steps necessary to achieve and maintain compliance with the LPDES permit.
2. To submit a comprehensive plan for the expeditious elimination and prevention of such noncomplying discharges.
3. To submit a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Compliance Order.

C) DMR Review

A review of the discharge monitoring reports for the period beginning October 2005 through September 2007 has revealed the following violations:

Parameter	Outfall	Period of Excursion	Permit Limit	Reported Quantity
NH_3-N, Monthly Avg.	001	October 2005	13.3 lbs/day	25.4 lbs/day
NH_3-N, Monthly Avg.	001	October 2005	2 mg/l	7.9 mg/l
NH_3-N, Weekly Avg.	001	October 2005	4 mg/l	14.2 mg/l

Fecal Coliform, Weekly Avg.	001	October 2005	400 cfu/100 ml	>1,000 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	March 2006	400 cfu/100 ml	430 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	April 2006	400 cfu/100 ml	>1,000 cfu/100 ml
NH_3-N, Monthly Avg.	001	June 2006	13.3 lbs/day	35.0 lbs/day
NH_3-N, Monthly Avg.	001	June 2006	2 mg/l	11.3 mg/l
NH_3-N, Weekly Avg.	001	June 2006	4 mg/l	16.2 mg/l
NH_3-N, Monthly Avg.	001	July 2006	13.3 lbs/day	66.5 lbs/day
NH_3-N, Monthly Avg.	001	July 2006	2 mg/l	16.6 mg/l
NH_3-N, Weekly Avg.	001	July 2006	4 mg/l	20.6 mg/l
Fecal Coliform, Monthly Avg.	001	July 2006	200 cfu/100 ml	>1,000 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	July 2006	400 cfu/100 ml	>1,000 cfu/100 ml
NH_3-N, Weekly Avg.	001	August 2006	4 mg/l	5.7 mg/l
Fecal Coliform, Monthly Avg.	001	August 2006	200 cfu/100 ml	454 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	August 2006	400 cfu/100 ml	>1,000 cfu/100 ml
NH_3-N, Monthly Avg.	001	October 2006	2 mg/l	2.6 mg/l
NH_3-N, Weekly Avg.	001	October 2006	4 mg/l	4.4 mg/l
NH_3-N, Monthly Avg.	001	November 2006	2 mg/l	2.9 mg/l
NH_3-N, Weekly Avg.	001	November 2006	4 mg/l	9.9 mg/l
Fecal Coliform, Weekly Avg.	001	November 2006	400 cfu/100 ml	>1,000 cfu/100 ml
NH_3-N, Monthly Avg.	001	March 2007	13.3 lbs/day	23.1 lbs/day
NH_3-N, Monthly Avg.	001	March 2007	2 mg/l	3.8 mg/l
NH_3-N, Weekly Avg.	001	March 2007	4 mg/l	7.0 mg/l
NH_3-N, Monthly Avg.	001	May 2007	13.3 lbs/day	15.5 lbs/day
NH_3-N, Monthly Avg.	001	May 2007	2 mg/l	4.8 mg/l
NH_3-N, Weekly Avg.	001	May 2007	4 mg/l	8.7 mg/l
NH_3-N, Monthly Avg.	001	June 2007	13.3 lbs/day	30.3 lbs/day
NH_3-N, Monthly Avg.	001	June 2007	2 mg/l	9.0 mg/l
NH_3-N, Weekly Avg.	001	June 2007	4 mg/l	12.6 mg/l
Fecal Coliform, Monthly Avg.	001	June 2007	200 cfu/100 ml	325 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	June 2007	400 cfu/100 ml	>1,000 cfu/100 ml
NH_3-N, Monthly Avg.	001	July 2007	13.3 lbs/day	39.4 lbs/day
NH_3-N, Monthly Avg.	001	July 2007	2 mg/l	9.2 mg/l
NH_3-N, Weekly Avg.	001	July 2007	4 mg/l	13.7 mg/l
Fecal Coliform, Monthly Avg.	001	July 2007	200 cfu/100 ml	677 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	July 2007	400 cfu/100 ml	>1,000 cfu/100 ml
NH_3-N, Monthly Avg.	001	August 2007	13.3 lbs/day	16.9 lbs/day
NH_3-N, Monthly Avg.	001	August 2007	2 mg/l	5.7 mg/l
NH_3-N, Weekly Avg.	001	August 2007	4 mg/l	9.2 mg/l
NH_3-N, Monthly Avg.	001	September 2007	13.3 lbs/day	17.0 lbs/day
NH_3-N, Monthly Avg.	001	September 2007	2 mg/l	4.1 mg/l
NH_3-N, Weekly Avg.	001	September 2007	4 mg/l	6.0 mg/l
Fecal Coliform, Weekly Avg.	001	September 2007	400 cfu/100 ml	>1,000 cfu/100 ml

XII. ADDITIONAL INFORMATION:

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDL's. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the

permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.8 MGD.

Effluent loadings are calculated using the following example:

BOD_5: 8.34 lb/gal x 0.8 MGD x 10 mg/l = 67 lbs/day

The Monitoring Requirements, Sample Types, and Frequency of Sampling shall be as follows and are in accordance with the previous permit. The previous permit allowed for a reduction in monitoring frequency for $CBOD_5$ and TSS.

Effluent Characteristics	Monitoring Requirements	
	Measurement Frequency	Sample Type
Flow	Continuous	Recorder
$CBOD_5$	once/2 months	3 Hr. Composite
Total Suspended Solids	twice/month	3 Hr. Composite
Ammonia-Nitrogen	once/week	3 Hr. Composite
Dissolved Oxygen	once/week	Grab
Fecal Coliform Bacteria	once/week	Grab
pH	once/week	Grab
TDS	once/quarter	3 Hr. Composite

In order to allow the permittee time to upgrade the facility to meet limitations imposed by a TMDL, **INTERIM LIMITS** are proposed for this facility.

The permittee shall achieve compliance with the FINAL EFFLUENT LIMITATIONS and MONITORING REQUIREMENTS as specified in accordance with the following schedule:

ACTIVITY	DATE
Achieve Interim Effluent Limitations and Monitoring Requirements	On the effective date of the permit
Achieve Final Effluent Limitations and Monitoring Requirements	On or before April 25, 2009

The above listed activities must be achieved on or before the deadline date. Additionally, the permittee shall submit a progress report outlining the status of all facility improvements on a yearly basis until compliance is achieved.

Within 14 days of completion of the new facility or facility upgrade and/or expansion, the Permittee shall notify the Department of Environmental Quality-Office of Environmental Services in writing that construction has been completed.

The Permittee shall achieve sustained compliance with Final Effluent Limitations.

Where the percent project completion reported is less than would be required to assure completion of necessary upgrades by the required date, the report of progress shall also include and explanation for

this delay and proposed remedial actions.

No later than 14 days following a date for a specific action (as opposed to a report of progress), the permittee shall submit a written notice of compliance or noncompliance.

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, general pretreatment language will be used due to the lack of either an approved or required pretreatment program.

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

Acceptance of Hauled Domestic Septage

The permit application did not indicate that hauled domestic septage was being accepted at the facility. However, according to an inspection on November 29, 2007, and a written correspondce from the Town of Church Point dated December 18, 2007, the facility is currently receiving hauled domestic septage. Therefore, specific requirements pertaining to the acceptance of hauled domestic septage has been included in the discharge permit.

The audit evaluation period is as follows:

Audit Period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

XIII TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Town of Church Point, Church Point Wastewater Treatment Facility, December 7, 2007.